



October 17, 2025

The Honorable Theodore D. Chuang, U.S. District Judge  
6500 Cherrywood Lane, Suite 245  
Greenbelt, MD 20770  
(301) 344-3982

**Re: *Doe v. Musk*, 25-CV-00462**

Dear Judge Chuang,

Plaintiffs respectfully submit this notice letter pursuant to the discussion between the Court and counsel for all parties during the September 25, 2025 Case Management Conference and the Court's subsequent Order, ECF No. 164, which allows Plaintiffs leave to file a Motion for Partial Summary Judgment.

Plaintiffs will not file a motion for partial summary judgment in advance of discovery. Rather, Plaintiffs will proceed with discovery on both the Appointments Clause and separation of powers claims, and file any dispositive motion(s) in accordance with the Scheduling Order, ECF No. 155. To that end, Plaintiffs and Defendants have sent initial written discovery requests to each other. Additionally, Plaintiffs have been working to set depositions, beginning with the deposition of fact witnesses not subject to Defendants' apex deposition objections, *see generally* ECF No. 113 at 16-20.

Further, Plaintiffs received Defendants' October 16 letter, ECF No. 168, regarding Defendants' Motion to Stay, ECF No. 165. Plaintiffs understand that pursuant to the Case Management Order, ECF No. 6, to properly file such a motion, Defendants were required to first seek a pre-motion conference with the Court, which they have not done. As Defendants noted in their letter, Plaintiffs object to a stay of this case. In the event the Court authorizes Defendants to file a motion to stay, Plaintiffs will file a response (which will note, among other arguments and as stated above, that Defendants are in fact already proceeding with discovery).

Respectfully submitted,

/s/ Tianna J. Mays

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